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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91216633
Party	Plaintiff Paramount Citrus LLC
Correspondence Address	Danielle M. Criona 11444 W. Olympic Blvd. 7th Floor Los Angeles, CA 90064 UNITED STATES dcriona@roll.com, mrivera@roll.com
Submission	Motion for Default Judgment
Filer's Name	Danielle M. Criona
Filer's e-mail	dcriona@roll.com, mrivera@roll.com
Signature	/s/ Danielle M. Criona /s/
Date	07/14/2014
Attachments	Motion for Deafult re VALO S (US).pdf(9026 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
TRADEMARK TRIAL AND APPEAL BOARD**

PARAMOUNT CITRUS LLC,)	
)	Opposition No. 91216633
Opposer,)	
)	Application Serial No. 86/058,639
v.)	VALO S
)	
VALASHIA D. JOHNSON)	Published in the <i>Official Gazette</i> of
)	February 11, 2014
Applicant.)	
)	OPPOSER’S MOTION FOR DEFAULT
)	JUDGMENT
)	
)	

Paramount Citrus LLC, on behalf of itself and its affiliates, related companies, and licensees (collectively, “Opposer”) hereby requests the entry of Default Judgment, pursuant to 37 C.F.R. §2.114(a) and Fed. R. Civ. P. 55(b), against VALO S, Serial Number 86/058,639 (the “Application” or the “VALO S Mark”), filed by Valashia D. Johnson (“Applicant”) for failure to Answer.

Opposer filed the Notice of Opposition of the Application owned by Applicant in the instant proceeding, and served correspondent for Applicant via U.S. Mail, on May 30, 2014 (the “Opposition”). [TTAB Docket No. 1.]

Applicant has not filed an Answer in this proceeding and has not contacted Opposer for any extension of time to file an Answer.

Pursuant to 37 C.F.R. §2.114(a) and Fed. R. Civ. P. 55(b), since Applicant has not filed an Answer to the Opposition, Applicant has not requested or been granted any extensions, and no good cause for not answering exists, Applicant is in default.

WHEREFORE, since Applicant is in default and has failed to show good cause why Default Judgment should not be entered against it, Opposer respectfully requests this Motion be granted, Default Judgment be entered against Applicant, and the VALO S Mark be denied registration.

Respectfully Submitted,

PARAMOUNT CITRUS, LLC

Date: July 14, 2014

By: /s/ Danielle M. Criona /s/

Danielle M. Criona, Esq.
Roll Law Group P.C.
11444 West Olympic Blvd., 7th Floor
Los Angeles, California 90064
Tel. (310) 966-8771
Fax (310) 966-8810
Email: dcriona@roll.com